Eric A. Prager (EP-0964) Atul R. Singh (AS-0873) Robert L. Jacobson DARBY & DARBY P.C.

7 World Trade Center

250 Greenwich Street

New York, NY 10007

Telephone: 212.527.7700 Facsimile: 212.527.7701

Email: eprager@darbylaw.com

Attorneys for Defendants

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

THE ASSOCIATED PRESS,

٧.

Plaintiff,

ALL HEADLINE NEWS CORP., ET AL.,

Defendants.

No. 1:08-CV-000323 (PKC) ECF CASE

MOTION FOR PRO HAC VICE ADMISSION OF ROBERT L. JACOBSON, ESQ.

Pursuant to Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I, Eric A. Prager, shareholder of the firm Darby & Darby P.C. and counsel for defendants All Headline News Corp., AHN Media Corp., Jeffrey W. Brown, and Danielle George in the above-captioned litigation, and a member in good standing of the Bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

Robert L. Jacobson, Esq. Darby & Darby P.C.

1191 Second Avenue, Floor 20 Seattle, WA 98101 Tel: (206) 262-8900

Fax: (206) 262-8901

Email: rjacobson@darbylaw.com

Attached hereto as Exhibit A is a Certificate of Good Standing dated March 3, 2008, issued within thirty (30) days of this Motion, stating that Mr. Jacobson is a member in good standing of the Washington State Bar.

An Affidavit in support and proposed Order is submitted herewith. The proscribed fee of \$25.00 shall be filed with the Clerk of Court.

Dated: March 13, 2008 New York, NY

Respectfully submitted,

DARBY & DARBY P.C.

By:

Eric A. Prager (EP-0964) 7 World Trade Center 250 Greenwich Street New York, NY 10007

Telephone: 212.527.7700 Facsimile: 212.527.7701

Email: eprager@darbylaw.com

Attorneys for Defendants

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

IN THE MATTER OF THE ADMISSION)) BAR NO. 30838
OF	CERTIFICATE OF GOOD
ROBERT L. JACOBSON	STANDING
TO PRACTICE IN THE COURTS OF THIS STATE))

I, Ronald R. Carpenter, Clerk of the Supreme Court of the State of Washington, hereby certify

ROBERT L. JACOBSON

was regularly admitted to practice as an Attorney and Counselor at Law in the Supreme Court and all the Courts of the State of Washington on December 1, 2000, and is now and has continuously since that date been an attorney in good standing, and has a current status of active.



IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of said Court this 3rd day of March, 2008.

Ronald R. Carpenter Supreme Court Clerk

Washington State Supreme Court

Eric A. Prager (EP-0964) Atul R. Singh (AS-0873) Robert L. Jacobson DARBY & DARBY P.C. 7 World Trade Center 250 Greenwich Street New York, NY 10007 Telephone: 212.527.7700 Facsimile: 212.527.7701

Email: eprager@darbylaw.com

Attorneys for Defendants

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	X	
THE ASSOCIATED PRESS,	: :	
Plaintiff,	: : :	No. 1:08-CV-000323 (PKC) ECF CASE
v.	:	
ALL HEADLINE NEWS CORP., ET AL.,	:	
Defendants.	: :	
	X	

AFFIDAVIT OF ERIC A. PRAGER IN SUPPORT OF MOTION FOR PRO HAC VICE ADMISSION OF ROBERT L. JACOBSON, ESQ.

- I, Eric A. Prager, being duly sworn, hereby deposes and says as follows:
 - I am a shareholder of the firm Darby & Darby, P.C., counsel for defendants

 All Headline News Corp., AHN Media Corp., Jeffrey W. Brown, and

 Danielle George in the above captioned action. I am familiar with the

 proceedings in this case. I make this statement based on my personal

 knowledge of the facts set forth herein.

2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in April 1994. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

Page 5 of 10

- 3. I have known Robert Jacobson since June 2004.
- 4. Mr. Jacobson is an associate at Darby & Darby, P.C., in Seattle, Washington.
- 5. I have found Mr. Jacobson to be a skilled attorney and a person of integrity.
 He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
- 6. Accordingly, I am pleased to move the admission of Robert Jacobson, pro hac vice.
- 7. I respectfully submit a proposed order granting the admission of Robert L.

 Jacobson, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Robert L. Jacobson, pro hac vice, to represent the defendants in the above captioned matter, be granted.

Dated: March 12, 2008 New York, NY

Respectfully submitted,

By: Eric A. Prager (EP-0964)

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WETTE GONZALEZ
NOTARY POLICE, COLES OF New York
No. 01C001185185
Qualified by Richmond County
Commencer: 25100 805110, 2010

Eric A. Prager (EP-0964) Atul R. Singh (AS-0873) Robert L. Jacobson DARBY & DARBY P.C. 7 World Trade Center 250 Greenwich Street New York, NY 10007 Telephone: 212.527.7700

Facsimile: 212.527.7701 Email: eprager@darbylaw.com

Defendants.

Attorneys for Defendants

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK THE ASSOCIATED PRESS, No. 1:08-CV-000323 (PKC) Plaintiff, **ECF CASE** v. ALL HEADLINE NEWS CORP., ET AL.,

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 14, 2008, I caused the following documents:

- 1. Motion for Pro Hac Vice Admission of Robert L. Jacobson, Esq. and
- 2. Affidavit of Eric A. Prager in Support of Motion for Pro Hac Vice Admission of Robert L. Jacobson, Esq.

to be served upon all parties by first-class mail, addressed as follows:

Andrew Lawrence Deutsch

Christine M. Jaskiewicz
DLA Piper US LLP (NY)
1251 Avenue of the Americas
New York, NY 10020

By:

Eric A. Prager (EP-0964) DARBY & DARBY P.C. 7 World Trade Center 250 Greenwich Street New York, NY 10007 Telephone: 212.527.7700

Telephone: 212.527.7700 Facsimile: 212.527.7701

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Attorneys for Defendants

Eric A. Prager (EP-0964) Atul R. Singh (AS-0873) Robert L. Jacobson DARBY & DARBY P.C. 7 World Trade Center 250 Greenwich Street New York, NY 10007 Telephone: 212.527.7700

Telephone: 212.527.7700 Facsimile: 212.527.7701

Email: eprager@darbylaw.com

Attorneys for Defendants

V.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
X	
THE ASSOCIATED PRESS, :	

Plaintiff,

No. 1:08-CV-000323 (PKC) ECF CASE

ALL HEADLINE NEWS CORP., ET AL.,

Defendants. : -----x

ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION

Upon the motion of Eric A. Prager attorney for defendants All Headline News Corp., AHN Media Corp., Jeffrey W. Brown, and Danielle George and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Robert L. Jacobson, Esq.
Darby & Darby P.C.
1191 Second Avenue, Floor 20
Seattle, WA 98101
Tel: (206) 262-8900

> Fax: (206) 262-8901 Email: rjacobson@darbylaw.com

is admitted to practice pro hac vice as counsel for the defendants in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing the discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:	
	P. Kevin Castel
	UNITED STATES DISTRICT JUDGE